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Legal Department
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Washington, DC 20036-3351

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Jonathan Banks
General Attorney

202 463 4182
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October 30, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

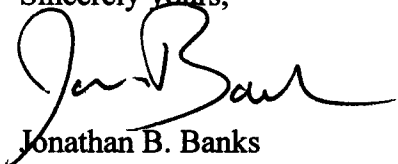
Re: EX PARTE - CC Docket No. 01-277

Dear Ms. Salas:

We supplied the attached written material to Department of Justice concerning BellSouth's performance at their request.

I am filing notice of this ex parte in the docket identified above, as required by Commission rules, and request that you associate this notice with the record of that proceeding. If you have any questions concerning this, please call me at (202) 463-4182.

Sincerely yours,



Jonathan B. Banks

Attachments

cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith (Department of Justice)
Cynthia Lewis (Department of Justice)

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October 30, 2001

Via Fax – (202) 514-6543

R. Hewitt Pate
Deputy Assistant Attorney General
U. S. Department of Justice
Antitrust Division
950 Pennsylvania Avenue, N.W.
Room 3645
Washington, D.C. 20530

Via Fax – (202) 514-5847

William Robert Majure
Assistant Chief of Economic Regulatory Section
U. S. Department of Justice
Antitrust Division
600 E Street, N.W.
Suite 10000
Washington, D.C. 20530

Dear Messrs. Pate and Majure:

BellSouth would like to thank you for taking the time to meet with us to discuss our Georgia and Louisiana 271 applications. At our meeting, a question was raised about the attached charts showing BellSouth's excellent performance at meeting rapidly increasing demand for the UNE-Platform in Georgia. The question concerned whether results for different months were calculated under different methods, which could make month-to-month comparisons misleading.

All data on each chart was calculated under a consistent methodology. BellSouth does restate performance data whenever it discovers an error. Every time performance data is restated in Georgia, it is filed with the PSC. The state filing highlights the changes for the Commission's review. The Georgia PSC is keenly interested in the details of BellSouth's performance measurements and reporting and, especially, BellSouth's actual performance. Excerpts of filings that provide detail on every refiling for the particular measures reported on the charts provided to you are attached.

R. Hewitt Pate
William Robert Majure
October 30, 2001
Page Two

When BellSouth restates performance data, it restates performance for previous months so that performance is reported consistently across months whenever possible. Where any data underlying the charts we provided to you were restated, that restatement was applied consistently across every month on the charts. Thus, the charts provide a valid and consistent way to evaluate BellSouth's performance against the rapid increase in CLEC orders for the UNE-Platform.

As you can see from the excerpts showing all the relevant data restatements, BellSouth is committed to correcting errors regardless of whether the correction raises or lowers performance or affects only the statistical testing applied to the data. You will note that no data were restated for any of the measures on the attached charts in August, and there was only one restatement for July. No data were restated for the Firm Order Confirmation measure during any of the four months at issue. Data were restated for several of the measures in May and June. On the attached data restatements, the top line for each restatement shows the original filing and the second line shows the restated performance. The restatements should be clear from the attached charts. If not, we would be happy to supply any details.

Very truly yours,

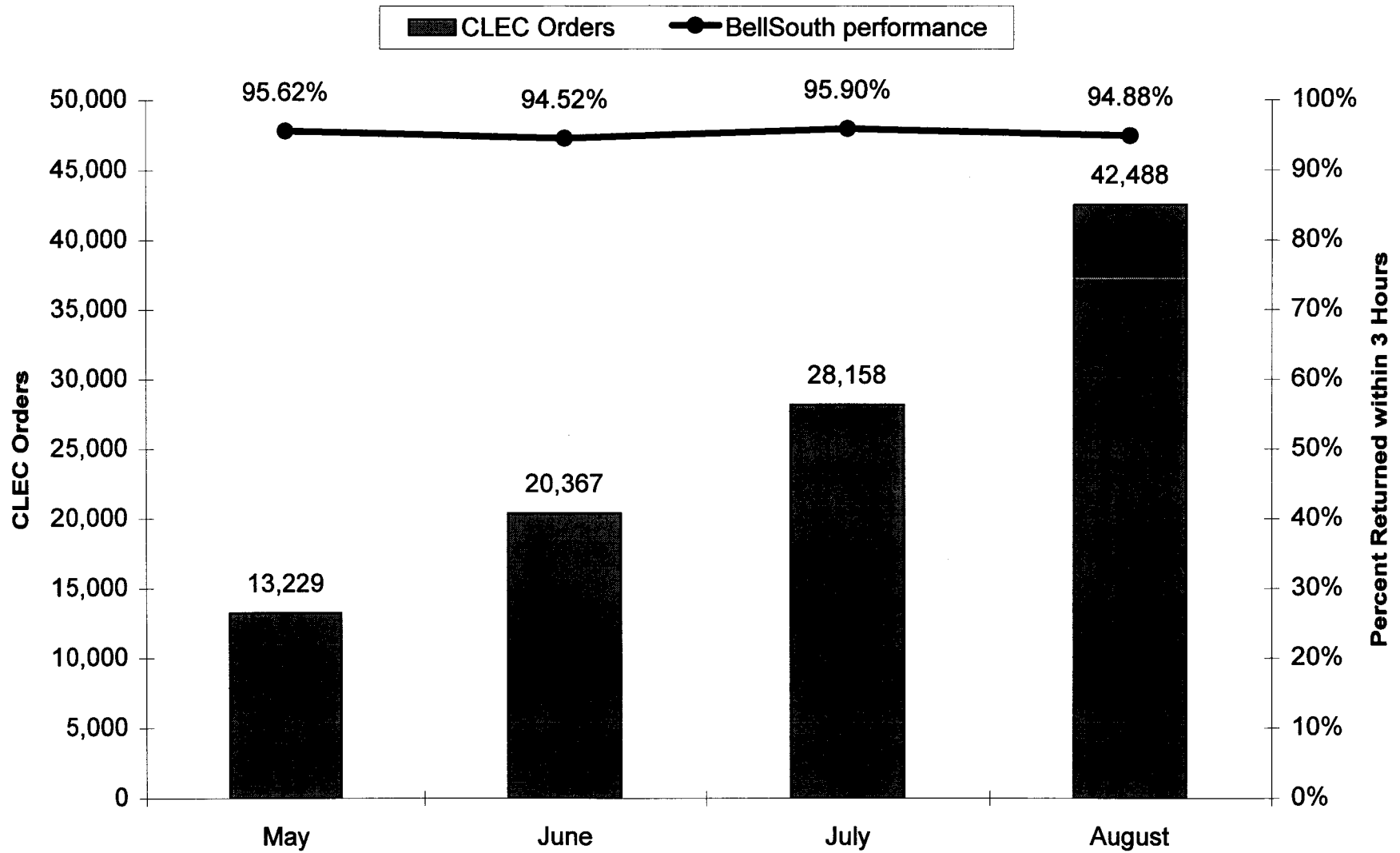
A handwritten signature in black ink, appearing to read "Jon Banks", written over the typed name.

Jonathan B. Banks

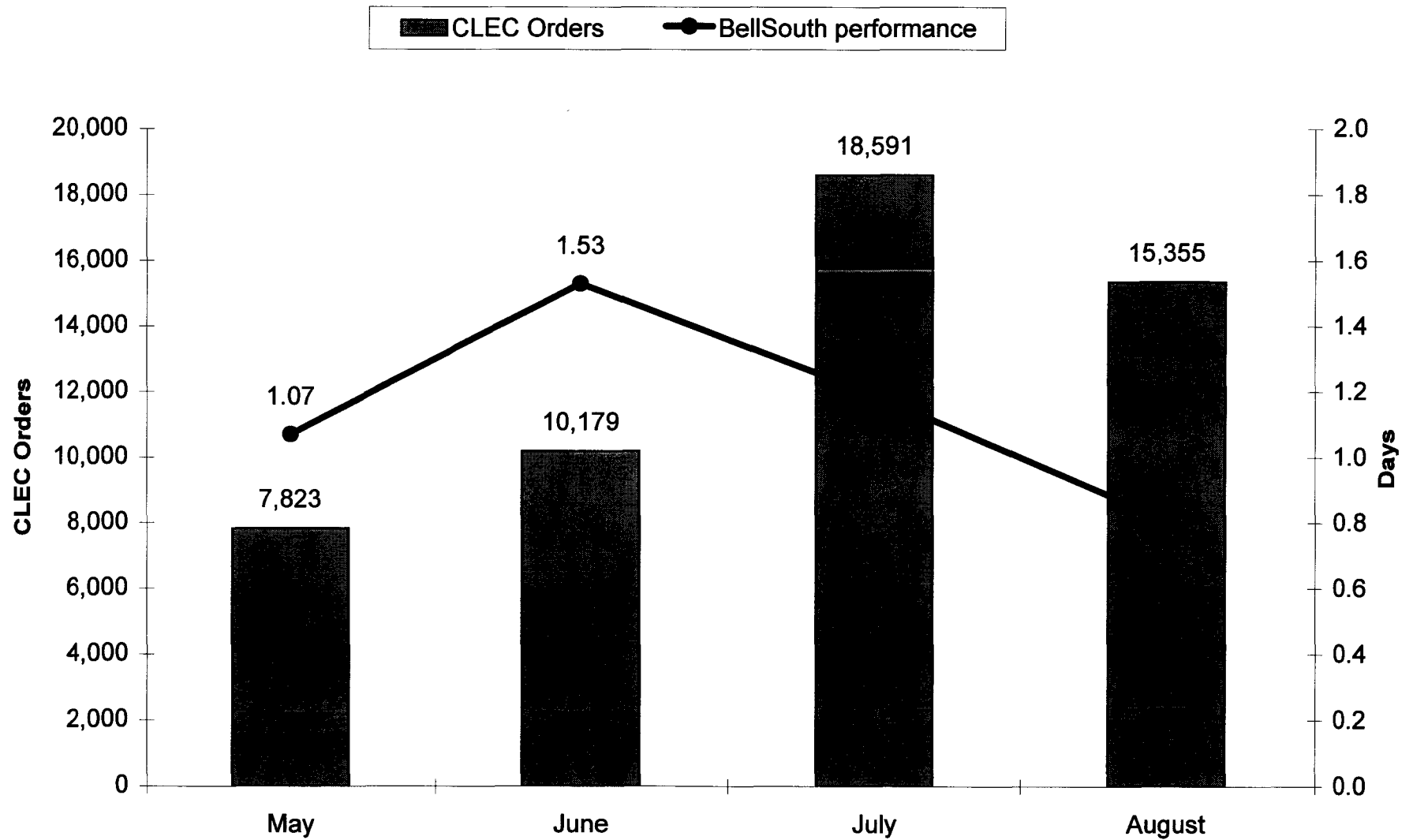
Attachments

cc: Cynthia Lewis (via fax)

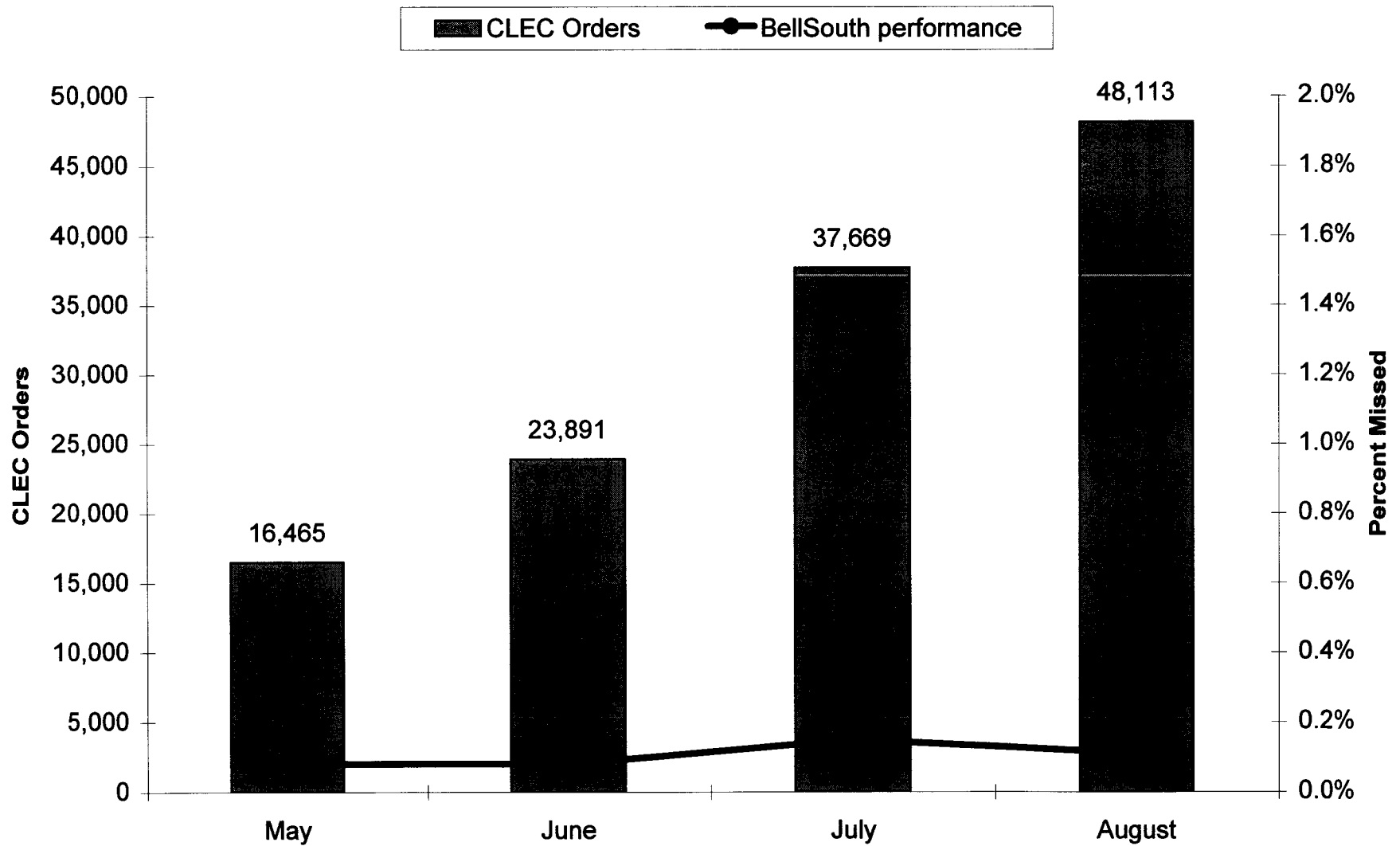
Firm Order Confirmation Timeliness – Mechanized – Loop + Port Combinations – Georgia



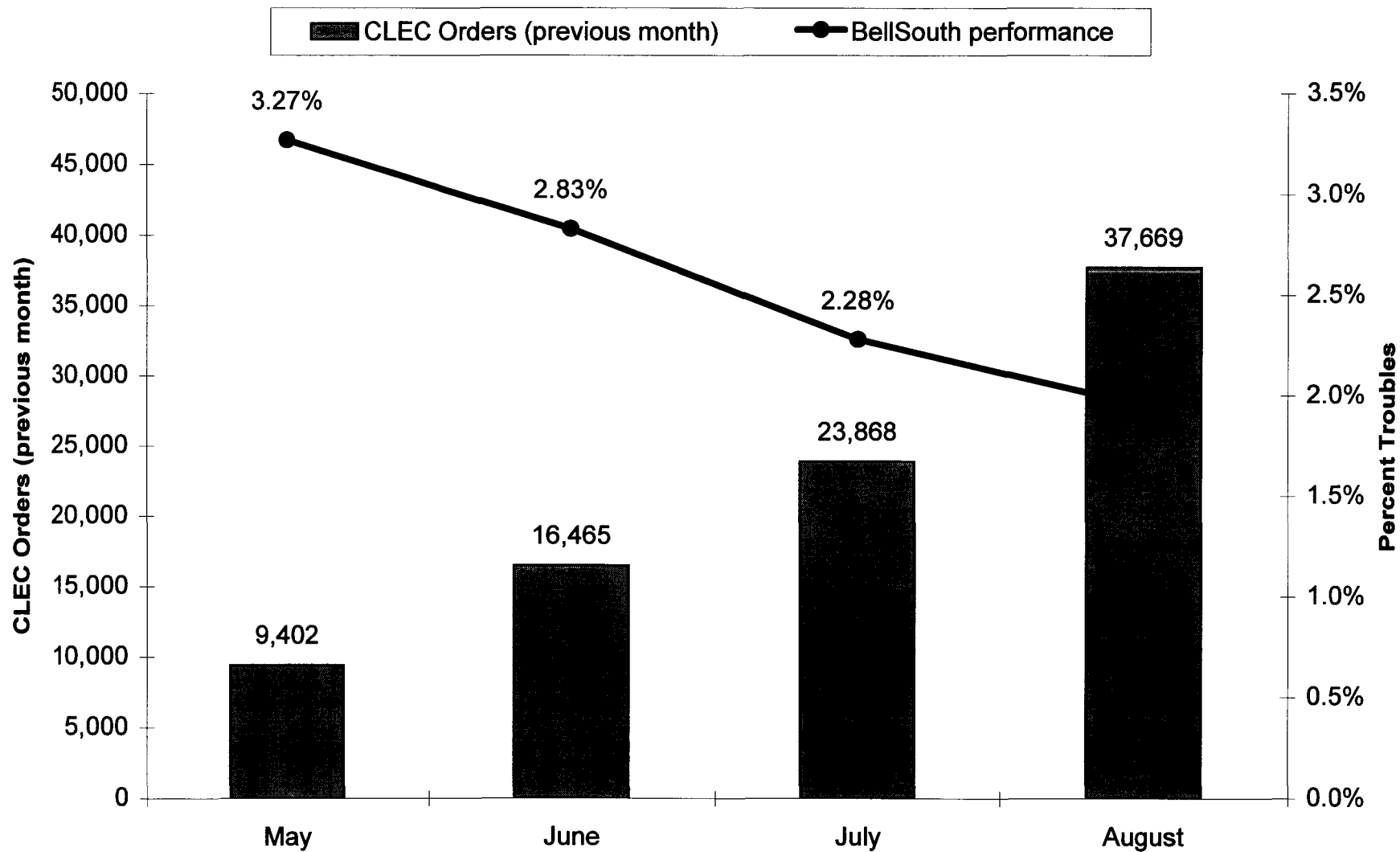
Order Completion Interval – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia



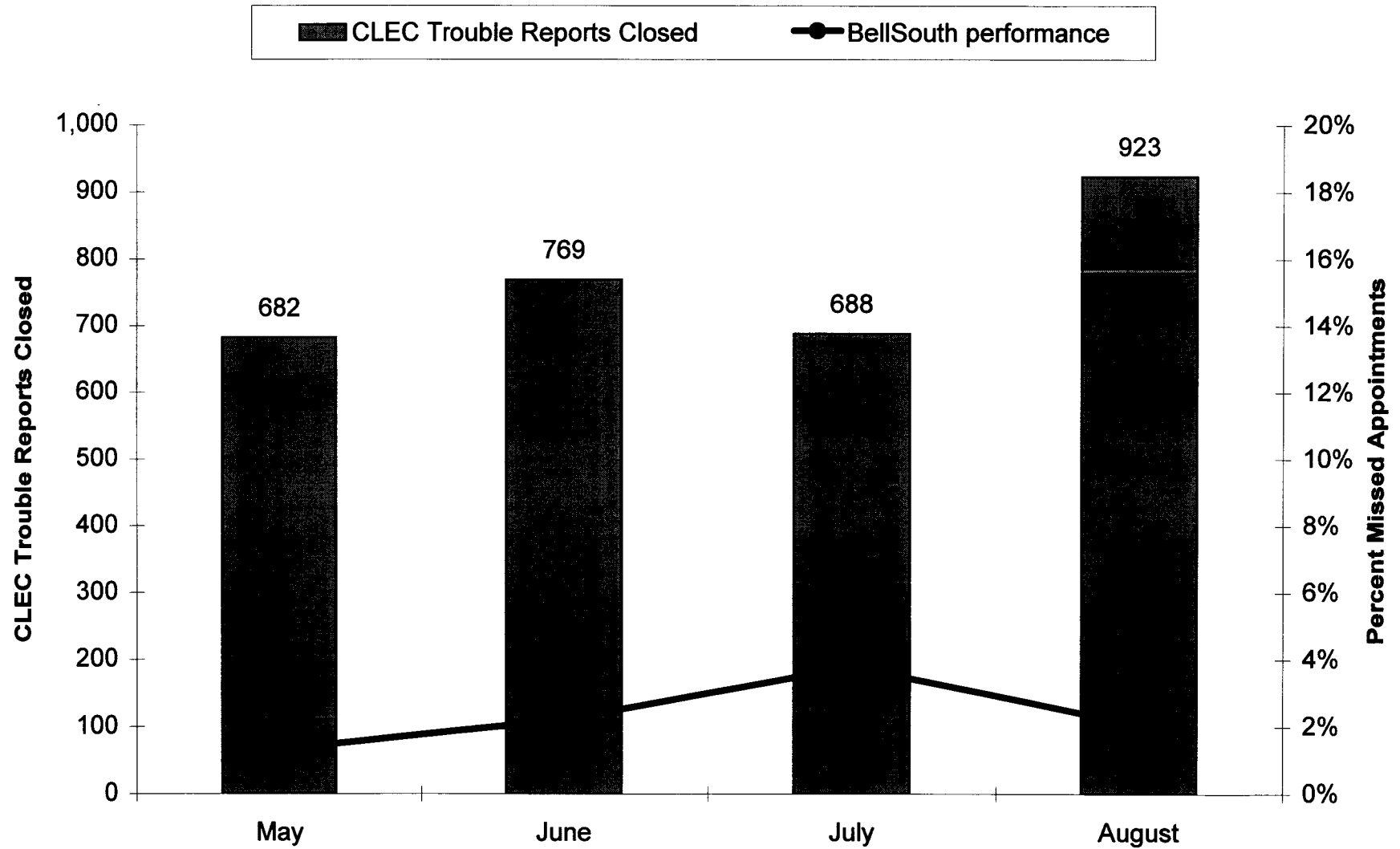
**% Missed Installation Appointments –
Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia**



% Provisioning Troubles within 30 Days – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia



Missed Repair Appointments – Loop + Port Combinations/ Non-Dispatch – Georgia



**REVISIONS TO RESULTS
FOR KEY PERFORMANCE MEASURES
(May – August 2001)**

**Firm Order Confirmation Timeliness – Mechanized – Loop + Port Combinations –
Georgia**

May

No Revisions

June

No Revisions

July

No Revisions

August

No Revisions

REVISIONS TO RESULTS FOR KEY PERFORMANCE MEASURES (May – August 2001)

% Missed Installation Appointments – Loop + Port Combinations/<10 circuits/Non-Dispatch – Georgia

Benchmark / Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
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May

B.2.18.3.1.2	P-3	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	0.08%	489,517	0.06%	18,465		0.00020	0.2150	YES	7/02 MSS
B.2.18.3.1.2	P-3	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	0.06%	489,517	0.08%	18,465		0.00020	-0.7280	YES	7/07 MSS

June

B.2.18.3.1.2	P-3	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	0.06%	457,412	0.00%	5,107		0.00035	1.7482	YES	Ext MSS
B.2.18.3.1.2	P-3	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	0.06%	457,412	0.08%	23,891		0.00016	-1.2064	YES	8/22 MSS

July

No Revisions

August

No Revisions

REVISIONS TO RESULTS FOR KEY PERFORMANCE MEASURES (May – August 2001)

Order Completion Interval – Loop + Port Combinations/<10 circuits/Non-Dispatch – Georgia

Benchmark / Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
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May

B.2.1.3.1.2	P-4	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (days)	R&B	1.04	451,147	1.07	7,823	2.715	0.03098	-1.0538	YES	7/02 MSS
B.2.1.3.1.2	P-4	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (days)	R&B	1.04	451,147	1.07	7,823	2.715	0.03098	-1.1271	YES	7/07 MSS

June

B.2.1.3.1.2	P-4	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (days)	R&B	0.88	436,345	0.33	4,988	1.447	0.02061	26.5406	YES	Ext MSS
B.2.1.3.1.2	P-4	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (days)	R&B	0.88	436,345	1.53	10,179	1.447	0.01451	-44.9710	NO	8/22 MSS

July

No Revisions

August

No Revisions

REVISIONS TO RESULTS FOR KEY PERFORMANCE MEASURES (May – August 2001)

% Provisioning Troubles within 30 Days– Loop + Port Combinations/<10 circuits/Non-Dispatch – Georgia

Benchmark / Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
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May

B.2.19.3.1.2	P-9	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	4.16%	466,678	3.27%	9,402		0.00208	4.2596	YES	7/02 MSS
B.2.19.3.1.2	P-9	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	4.16%	466,678	3.27%	9,402		0.00208	4.2624	YES	7/07 MSS

June

B.2.19.3.1.2	P-9	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	4.38%	469,517	0.88%	16,465		0.00162	21,5516	YES	Ext MSS
B.2.19.3.1.2	P-9	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	4.38%	469,517	2.83%	16,465		0.00162	9.5330	YES	8/22 MSS

July

B.2.19.3.1.2	P-9	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	4.34%	457,412	2.11%	18,784		0.00152	14.6784	YES	8/30 Posted MSS
B.2.19.3.1.2	P-9	Loop + Port Combinations/<10 circuits/Non-Dispatch/GA (%)	R&B	4.34%	457,412	2.28%	23,868		0.00135	15.2025	YES	9/12 MSS

August

No Revisions

REVISIONS TO RESULTS FOR KEY PERFORMANCE MEASURES (May – August 2001)

Missed Repair Appointments – Loop + Port Combinations/Non-Dispatch – Georgia

Benchmark / Analog	BST Measure	BST Volume	CLEC Measure	CLEC Volume	Standard Deviation	Standard Error	ZScore	Equity
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May

B.3.1.3.2
B.3.1.3.2

M&R-1	Loop + Port Combinations/Non-Dispatch/GA (%)
M&R-1	Loop + Port Combinations/Non-Dispatch/GA (%)

R&B
R&B

2.19%	58,007	1.32%	680		0.00585	1.5451	YES	7/02 MSS
2.19%	58,007	1.32%	682		0.00564	1.5480	YES	7/07 MSS

June

No Revisions

July

No Revisions

August

No Revisions